

## About EthicsPoint

### What is NAVEX EthicsPoint?

Navex EthicsPoint is a third-party confidential reporting tool created by NAVEX that enables management and employees to report fraud, abuse, or misconduct.

### Why do we need our **Speak Up** to be managed by EthicsPoint?

By engaging an independent third party that specializes in hotline services, our employees (or anyone else that would like to report a concern) can feel confident that reports are handled securely and confidentially. In addition to providing service 24 hours a day, EthicsPoint offers translation services that allow telephone and web reports to be made in multiple languages.

Please note that due to variations in local law, there may be limits on anonymous reports.

## Reporting – General

### May I report using either the Internet or the telephone?

Yes. EthicsPoint enables you to file a confidential, anonymous report via either the telephone or the online reporting form.

### What types of situations should I report?

The EthicsPoint system allows employees or anyone else with a concern—including suppliers, partners, or customers—to report any violation of our Code of Conduct, or other concern you may have. If you have a general question that you believe does not warrant filing a report, you may also send an email to [BHN.Compliance@bhnetwork.com](mailto:BHN.Compliance@bhnetwork.com).

### If I see a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

When you observe some behavior that you believe violates our code of conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager or other member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with EthicsPoint. We would rather you report anonymously than keep the information to yourself.

### **Why should I report what I know? What's in it for me?**

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment.

### **Does management really want me to report?**

Yes. In fact, we *need* you to report. You know what is going on in our company - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can help limit the potential negative impact on the company and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

### **Where do these reports go? How can I trust that my report is confidential?**

Navex EthicsPoint is a third-party confidential reporting tool created by NAVEX, an independent organization engaged by Blackhawk to help management and employees report fraud, abuse, or misconduct. By engaging an independent third party that specializes in hotline services, our employees (or anyone else that would like to report a concern) can feel confident that reports are handled securely and confidentially.

Reports are entered directly on the EthicsPoint secure server. EthicsPoint does not trace phone calls, use caller identification, or maintain internal connection logs containing Internet Protocol (IP) addresses. Furthermore, EthicsPoint does not have any information about Blackhawk's employees.

Only the information you include in a report—whether through the online form or by discussing with an EthicsPoint staff member—is shared by EthicsPoint with Blackhawk. EthicsPoint makes reports available only to specific individuals (“case managers”) within Blackhawk who are charged with evaluating the report, based on the type of violation and location of the incident. EthicsPoint staff review each report to ensure that if your report includes one of our designated case managers, your report will not be sent to that individual. Each case manager has had training in keeping these reports in the utmost confidence.

### **What happens after I submit a report?**

Blackhawk case managers will examine the information in your report and ensure appropriate investigation, based on the individual circumstances of each case. If Blackhawk identifies any policy violations or other misconduct, appropriate disciplinary action and/or process changes will be implemented.

While anonymous reports are helpful, please note that sometimes it is not possible for Blackhawk to perform a full investigation without all the facts of who is involved in a situation. If you feel comfortable, we always encourage you to identify yourself so that your concern can be more fully investigated.

## Reporting Security & Confidentiality

**It is my understanding that any report I send from a company computer generates a server log that shows every website that my PC connects with. Won't this log identify me as the report originator?**

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café or at a friend's house) through the EthicsPoint secure website.

**Can I file a report from home and still remain anonymous?**

A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained.

**I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?**

The EthicsPoint system protects your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years..."

While anonymous reports are helpful, please note that sometimes it is not possible for Blackhawk to perform a full investigation without all the facts of who is involved in a situation. If you feel comfortable, we always encourage you to identify yourself so that your concern can be more fully investigated.

**Is the telephone toll-free hot line confidential and anonymous too?**

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

**What if I want to be identified with my report?**

There is a section in the report to identify yourself, if you wish.

## Tips & Best Practices

**I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?**

File a report. EthicsPoint can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked.

**What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?**

The EthicsPoint system and report distribution ensure that implicated parties are not notified or granted access to reports in which they have been named.

Depending on the nature of your report, it is likely that a Blackhawk case manager will need to interview anyone suspected of misconduct. Blackhawk case managers take the utmost care with confidentiality during these investigations.

**What if I remember something important about the incident after I file the report? Or what if Blackhawk has further questions for me concerning my report?**

When you file a report at the EthicsPoint Web site or through the EthicsPoint Call Center, you receive a unique, randomized number called a "Report Key" and are asked to choose a password. You can anonymously return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative. We strongly suggest that you return to the site in the time specified to answer company questions. You and the company now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

**What if I lose my Report Key or forget the Password I created?**

To ensure that security and confidentiality is maintained, if you lose your report key or password, you will need to file a new report. Mention in the new report that it is related to a report or question you previously submitted.